

# A-Part 1/Item 5

## Closure Plan for

### CWC

## CONTENTS

11.0	CLOSURE AND FINANCIAL ASSURANCE [I and I-1i]	11-1
11.1	CLOSURE PLAN [I-1]	11-1
11.1.1	Closure Performance Standard [I-1a]	11-1
11.1.1.1	Performance Standard	11-1
11.1.1.2	Removal or Decontamination Standard	11-1
11.1.2	Closure Activities [I-1b]	11-2
11.1.3	Maximum Extent of Operation [I-1b(1) and I-1c]	11-3
11.1.4	Inventory Removal, Disposal or Decontamination of Equipment, Structures, and Soils [I-1b(2) and (3)]	11-3
11.1.4.1	Removal of Waste Inventory	11-3
11.1.4.2	Survey and Inspection	11-3
11.1.4.3	Decontamination and Removal of Equipment	11-3
11.1.4.4	Decontamination of Structures	11-3
11.1.4.5	Decontamination of the Waste Storage Pad	11-4
11.1.4.6	Verification Survey and Inspection	11-4
11.1.4.7	Remediation	11-4
11.2	SCHEDULE FOR CLOSURE [I-1f]	11-4
11.3	CERTIFICATION OF CLOSURE	11-5

## FIGURE

11-1.	Example Inspection Checklist for CWC Closure Activities	F11-1
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## 11.0 CLOSURE AND FINANCIAL ASSURANCE [I and I-1i]

This chapter presents the closure plan for CWC. Closure of CWC will comply with WAC 173-303-610 regulations for TSD units. As a storage and treatment unit, the CWC is not anticipated to become extensively contaminated by dangerous waste.

CWC is operated as a clean, well-maintained unit. Detailed records are maintained of the materials stored at CWC. Spills and other unusual occurrences are handled promptly and documented. The closure approach will be clean closure. Consistent with the criteria that must be met to clean close a TSD unit, no postclosure activities will be necessary [refer to General Information Portion (DOE/RL-91-28)]. Clean closure may be pursued for one or more structures at the CWC (partial closure) or for the entire CWC. The closure process will be the same for partial closure or closure of the entire CWC. This chapter describes the performance standards that will be met and closure activities that will be conducted to achieve clean closure.

Federal facilities are not required to comply with WAC 173-303-620 as is stated in the regulations and as described in Condition II.H.3. of the Dangerous Waste Portion of the Hanford Facility RCRA Permit (Ecology 1994).

### 11.1 CLOSURE PLAN [I-1]

The following sections address closure performance standards, waste removal, and decontamination standards.

#### 11.1.1 Closure Performance Standard [I-1a]

These sections describe the performance and removal or decontamination standards to be applied to CWC.

**11.1.1.1 Performance Standard.** This plan has been developed to close CWC in a manner that meets the closure performance standards of WAC 173-303-610(2).

In general, these standards can be achieved by removing, to background levels or regulatory thresholds, dangerous waste from CWC, and by decontaminating and removing all equipment, structures, soils, or other materials containing or contaminated with dangerous waste or waste residue.

**11.1.1.2 Removal or Decontamination Standard.** Clean closure of CWC requires removal and disposal of all dangerous waste present in the storage structures, removal and disposal of all contaminated equipment and structural components, decontamination of any contaminated storage building surfaces, remediation of any contaminated soil attributable to CWC within the storage unit boundary, and restoration of the area. Any materials, equipment, or structures that are removed from CWC will be designated in accordance with WAC 173-303-070 and disposed of accordingly. Because soil contamination from CWC operations is not expected, no sampling is planned for clean closure. The CWC will be considered clean when surfaces are free of dangerous waste contamination, if there are no measurable amounts of radiological contamination above background levels, and no obvious visual signs of potential dangerous waste contamination.

For partial closure of CWC, Ecology will be notified in writing that partial closure activities are beginning. The written notification will indicate those portions being closed. Closure activities for partial closure will be the same as closure for the entire CWC.

### 11.1.3 Maximum Extent of Operation [I-1b(1) and I-1c]

An estimated maximum waste inventory is identified in Chapter 4.0, Table 4-1. The volumes are given as 208-liter container equivalents. The volume within each container consists of waste and all necessary packing material.

### 11.1.4 Inventory Removal, Disposal or Decontamination of Equipment, Structures, and Soils [I-1b(2) and (3)]

The CWC provides storage capacity for both onsite and offsite waste generated before final disposal. At the time of closure, no waste will remain at CWC.

**11.1.4.1 Removal of Waste Inventory.** At closure, all containers of waste will be removed from the storage structures. The containers of waste will be transferred to another permitted onsite TSD unit or permitted offsite facility. The waste could be moved out of the storage structures at different times, first removing the containers from one of the structures. This would allow some containers to be moved into a still active structure, while the other structure(s) undergoes closure activities.

**11.1.4.2 Survey and Inspection.** After removal of the waste containers, a radiation survey will be performed on the interior walls, grating(s), containment basin(s), and floor(s). Any area showing measurable radiological levels above background levels will be noted for closer examination during visual inspection.

A visual assessment of whether spills have occurred within the CWC will be performed after all waste has been removed. The visual inspection also will include evaluation to the extent possible of the interior walls, containment areas, grates, and floors. Photographs of the components will be taken during visual inspections and included with inspection checklist (Figure 11-1). For areas that show potential dangerous waste contamination, field personnel will determine whether to remove and dispose or to decontaminate.

**11.1.4.3 Decontamination and Removal of Equipment.** Most of the equipment at CWC is used for container handling and storage. This equipment could become contaminated in the event of a leaking or ruptured container.

The equipment will be removed from the area and managed or handled by one of the following methods: (1) decontamination and recycle or reuse, (2) disposal as dangerous waste, (3) disposal as mixed waste, or (4) disposal as a radiological waste. The method to be used will be determined based on the specific piece of equipment, the level of contamination, the waste designation performed in accordance with WAC 173-303-070, and the estimated quantity of waste to be generated during decontamination. Final disposal will be determined using appropriate techniques available at the time of closure.

**11.1.4.4 Decontamination of Structures.** Decontamination of contaminated structures or contaminated portions thereof will begin with a visual inspection and, where necessary, a radiation survey. In areas where surveys show measurable radioactivity, decontamination will be performed. Any waste deposits found during the visual inspection will be removed and disposed as appropriate.

1 For partial closure of the TSD unit, Ecology will be notified in writing that partial closure activities are  
2 beginning. The written notification will indicate those portions of the TSD unit being closed.  
3  
4

### 5 11.3 CERTIFICATION OF CLOSURE 6

7 PE certification of closure will cover only the portions of the CWC covered by the closure activities  
8 proposed (partial closure or closure of the entire unit). The PE certification will occur upon disposition of  
9 decontamination generated waste and completion of closure activities summarized in Section 11.1.2 and  
10 described in Section 11.1.4. The PE will provide a signed statement that meets the applicable requirements  
11 of WAC 173-303-610(6), certifying that the closure activities were performed in accordance with the  
12 technical specifications of the approved closure plan. A copy of the PE certification will be transmitted to  
13 Ecology and placed in the Administrative Record.  
14

15 The PE will certify that the unit has been closed in accordance with the approved partial closure plan.  
16 The PE certification is to confirm that the activities took place as described. The PE is not responsible for  
17 corroborating information on any part of the partial closure plan not addressing activities completed in  
18 support of closure.  
19  
20

## EXAMPLE

INSPECTION CHECKLIST  
FOR CWC CLOSURE ACTIVITIES

1. Storage structure identification: \_\_\_\_\_
2. Component description (e.g., wall, wood floor): \_\_\_\_\_
3. Material (e.g., wood, metal): \_\_\_\_\_

NOTE: Attach photographs taken during visual inspection.

## INITIAL INSPECTION

date: \_\_\_\_\_ time: \_\_\_\_\_

4. Radiation survey performance standard met? (at or below background):  
\_\_\_\_\_
5. Visual inspection performance standard met? (no obvious visual signs of potential contamination): \_\_\_\_\_
6. Comments on survey/inspection (or N/A if not applicable): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
7. If photographs taken, attach

## DECONTAMINATION, if required

date: \_\_\_\_\_ time: \_\_\_\_\_

8. (If required to move the structures) Radiation survey performance standard at decontamination location met? (at or below background):  
\_\_\_\_\_
9. Decontamination method used (or N/A): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
10. Comments on decontamination (or N/A): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
11. If photographs taken, attach

Figure 11-1. Example Inspection Checklist for CWC Closure Activities. (sheet 1 of 2)

## VERIFICATION INSPECTION, if required

date: \_\_\_\_\_ time: \_\_\_\_\_

12. Radiation survey performance standard met? (at or below background):  
\_\_\_\_\_

13. Visual inspection performance standard met? (no obvious visual signs of potential contamination): \_\_\_\_\_

14. Comments on verification inspection (or N/A): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

15. If photographs taken, attach.

## WITNESSES:

\_\_\_\_\_  
Print: name and title\_\_\_\_\_  
Signature / Date\_\_\_\_\_  
Print: name and title\_\_\_\_\_  
Signature / Date

Figure 11-1. Example Inspection Checklist for CWC Closure Activities. (sheet 2 of 2)